

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

1st UNITED TELECOM, INC.,

Plaintiff,

v.

MCI COMMUNICATIONS SERVICES,
INC., d/b/a VERIZON BUSINESS
NETWORK SERVICES,

Defendant.

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CASE NO. 3:10-CV-02255-B

MOTION TO COMPEL AND REQUEST FOR SANCTIONS

TO THE HONORABLE JUDGE JANE BOYLE:

NOW INTO COURT through undersigned counsel comes Defendant MCI Communication Services, Inc., d/b/a Version Business Network Services, and, for the reasons set forth in the accompanying memorandum, moves to compel Plaintiff 1st United Telecom, Inc., to provide the discovery requested in Exhibit A to the accompanying memorandum. In addition, Verizon Business respectfully requests that this Court impose sanctions, to include the costs of bringing this motion, on Plaintiff, due to Plaintiff's failure to comply with its discovery obligations.

WHEREFORE, Defendant prays that this Court find its motion is filed for good cause and issues an Order granting same.

Respectfully submitted,

s/ Stan Broome

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